

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re :  
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ZHANG MEDICAL P.C. d/b/a :  
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NEW HOPE FERTILITY CENTER :  
:  
:  
Debtor. :  
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Case No. 23-10678-pb

Sub-Chapter V Chapter 11

**EX PARTE ORDER PURSUANT TO FED. R. BANKR. P. 2004  
AUTHORIZING DISCOVERY OF MUTUAL OF AMERICA FINANCIAL GROUP  
AND/ OR MUTUAL OF AMERICA LIFE INSURANCE COMPANY**

Upon the Motion of Zhang Medical P.C. d/b/a New Hope Fertility Center (the "Debtor") for an order pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, authorizing the Debtor to obtain discovery in the form of demands for the production of documents and oral examinations, if necessary, from Mutual Of America Financial Group and/or Mutual of America Life Insurance Company ("Mutual"); notice of the Motion being due and sufficient under the circumstances and sufficient cause appearing therefor, it is hereby:

**ORDERED**, that the Motion is granted as set forth herein; it is further

**ORDERED**, that the Debtor is authorized to issue a subpoena to compel the production of documents in accordance with the document requests annexed to the Motion as Exhibit B to Mutual that requires the production of documents no later than seven (7) days from service of the subpoena, other than those documents withheld under a claim of privilege, and compels the testimony of Mutual on no less than ten (10) days' notice at a location to be determined by the Debtor that is within 100 miles of the location of the Debtor or person to be examined; and it is further

**ORDERED**, that the Debtor is authorized to serve the subpoena by certified or registered mail, email, and facsimile transmission to Mutual's last known business address, address for process of service, the email address and fax number available on its website; and it is further

**ORDERED**, that nothing herein shall limit Mutual's right under applicable law to object to or oppose any subpoena served upon it; and it is further

**ORDERED**, that the Debtor shall file with the court an affidavit or declaration of service for each subpoena served; and it is further

**ORDERED**, that this Court shall retain jurisdiction to resolve any issues with respect to this Order, the requested examinations, and/or the production of documents.

Dated: New York, New York  
June 29, 2023

/s/ Philip Bentley

**Honorable Philip Bentley**  
**United States Bankruptcy Judge**